

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA

**FILED**

MAY 21 2020

CARMELITA REEDER SHIN  
CLERK, U.S. DISTRICT COURT  
BY ae DEPUTY

UNITED STATES OF AMERICA, )

Plaintiff, )

-vs- )

SHAORONG LIU, )

Defendant. )

No. M-20-210-P

**MOTION TO SEAL COMPLAINT AND AFFIDAVIT**

The United States moves, pursuant to Local Criminal Rule 4.1 and 12.2, for an Order sealing the Complaint and Affidavit in the above-captioned case until the initial appearance of the named defendant or further order of the Court.

An Order sealing these documents is requested by the government for the reason that the above-styled matter is still in the process of investigation by the Federal Bureau of Investigation and the Department of Energy – Office of Inspector General and exposure at this time of the evidence, the identities of witnesses, and matters contained in the Affidavit will hamper the ongoing investigation.

Further, the Court has the authority to seal documents in appropriate circumstances. *United States v. McVeigh*, 119 F.3d 806, 811 (10th Cir. 1997) (finding that the district court has authority to seal judicial documents “if right to access is outweighed by the interests favoring nondisclosure”); *United States v. Hickey*, 767 F.2d 705, 708 (10th

Cir. 1985) (observing that “all courts have supervisory powers over their own records and files” and may, in their discretion seal documents); *Crystal Grower's Corp. v. Dobbins*, 616 F.2d 458, 461 (10th Cir. 1980) (“It is beyond question that this court has discretionary power to control and seal, if necessary, records and files in its possession.”).

WHEREFORE, the government requests that the Court issue an Order sealing the Complaint and Affidavit, and the Motion and Order sealing same.

Respectfully submitted,

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